

# 2010

## Baranof Castle Hill State Historic Site Preservation Plan



Division of Parks and Outdoor Recreation

Alaska Department of Natural Resources

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## EXECUTIVE SUMMARY

The Advisory Council on Historic Preservation, in coordination with the National Park Service, manages the **Preserve America** program—a federal initiative that encourages and supports community efforts to preserve and enjoy cultural and natural heritage resources. In 2008, the Advisory Council on Historic Preservation awarded a Preserve America grant to the Alaska Division of Parks and Outdoor Recreation (ADPOR), Office of History and Archaeology (OHA) to create preservation plans for the units of the Alaska State Park system designated as National Historic Landmarks. Those units include Fort Abercrombie State Historical Park in Kodiak, and Fort Rousseau Causeway State Historical Park, Baranof Castle Hill State Historic Site, and Old Sitka State Historical Park—all located in Sitka.

Established as a State Historic Site in 1959, Baranof Castle Hill was one of the first areas in Alaska to fall under the management of the Division of Parks and Outdoor Recreation. In 1962, Baranof Castle Hill was designated a National Historic Landmark because it was the location where the official American flag raising took place when ownership of Alaska was transferred from Russia to the United States. Although primary significance of the site is derived from its association with the flag raising ceremony, it was a significant site to the local Tlingit long before this ceremony took place. The archaeological collections from the Castle Hill dig indicate that the site has a rich history of over 1000 years of occupation. These archaeological records bear evidence of Tlingit occupation dating back hundreds of years, followed by the Russian occupation beginning in the early 1800s, and later the American occupation.

The ***Baranof Castle Hill State Historic Site Preservation Plan*** provides a framework for decisions pertaining to cultural resource protection, interpretive program development, and stewardship of the park. The preservation planning process involved inventorying resources, compiling research, and discussing and sharing ideas with park managers, industry professionals, and interested public during public meetings and comment periods.

## CHAPTER 1: INTRODUCTION

### HOW DID THE PLANNING PROCESS BEGIN?

In 2008, the Office of History and Archaeology (OHA) recognized that the development of preservation plans could help meet the goal to “*sustain Alaska’s cultural, ecological, scenic and scientific assets through proactive stewardship pursuant to the division’s parks and programs*” outlined in the division’s ten year strategic plan.<sup>1</sup> The Advisory Council on Historic Preservation’s *Preserve America* program awarded a planning grant to the Office of History and Archaeology because preservation plans are valuable tools for efforts aimed at preserving and enhancing historical, cultural, archaeological, and anthropological values, and promoting the enjoyment and stewardship of heritage resources. **Baranof Castle Hill State Historic Site Preservation Plan** is one of four preservation plans developed for National Historic Landmarks managed by the Alaska Division of Parks and Outdoor Recreation (ADPOR).

### WHAT IS A PRESERVATION PLAN SUPPOSED TO DO?

The preservation plan provides guidelines to assist park staff in reaching their short- and long-term objectives for the preservation and enhancement of cultural and historical resources and in making informed decisions regarding the day-to-day management of these resources. The document is intended to be a dynamic tool used to enhance and preserve the park’s historical, cultural, archaeological, and anthropological values, to promote the enjoyment and stewardship of the park resources, to support local recreation and tourism, and to encourage a variety of recreational and educational opportunities in the park for visitors of varying abilities while providing guidelines rather than hard and fast rules. The plan supports the National Historic Preservation Act, the Alaska Historic Preservation Act, and National Environmental Policy Act, but does not replace them in any way.

### WHAT IS A STATE HISTORICAL PARK?

The “Alaska State Park System: Statewide Framework” identifies designations for different types of parks based on their primary values to the public. Baranof Castle Hill, also known as Castle Hill, is a *state historic site* defined as “a relatively small area established and managed to preserve, interpret and/or commemorate a structure, object, and/or event of historical, cultural, archaeological, or anthropological value which represents an era of Alaska’s history or prehistory.”<sup>2</sup>

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<sup>1</sup> Alaska Division of Parks and Outdoor Recreation, *Division of Parks and Outdoor Recreation: Ten Year Strategic Plan 2007-2017*, 22-25.

<sup>2</sup> Alaska Division of Parks and Outdoor Recreation, *Alaska State Park System: Statewide Framework*, 8.

## PLAN ROADMAP

The plan has four principal components—goals and objectives, a brief historical and cultural background of the park, current park conditions, and recommended preservation and interpretation strategies for achieving the outlined goals. In addition, useful documents such as a glossary for difficult words or phrases such as preservation-specific language and treatment standards are attached as appendices.

## PUBLIC PROCESS

A public scoping meeting was held August 10, 2009, in Sitka to identify interpretive themes, preservation priorities, and concerns related to the use of Castle Hill State Historic Site (SHS). On August 12, 2009, division staff visited the park to identify all historic features, identify preservation issues, inventory existing interpretive programs, outline interpretive possibilities, and evaluate current uses. Public comments were accepted through September of 2009 for scoping. After the public comment period ended, staff compiled additional information, evaluated alternatives, and developed priorities. A draft plan was prepared and distributed for public review.

## CHAPTER 2: PLAN VISION, GOALS, AND OBJECTIVES

### CASTLE HILL SHS PRESERVATION PLAN VISION

The Alaska Division of Parks and Outdoor Recreation envisions the Baranof Castle Hill State Historic Site Preservation Plan as a tool used to enhance and preserve the park's historical, cultural, archaeological, and anthropological values, to promote the enjoyment and stewardship of the park resources, to support local recreation and tourism, and to encourage a variety of recreational and educational opportunities in the park for visitors of varying abilities.

### PRESERVATION GOALS

The goals and strategies outlined below are intended to facilitate the management of the historical and cultural resources of Castle Hill, and to protect and enhance the park's heritage.

- Recognize the important strategic location of Castle Hill while emphasizing its continued value to the community.
- Facilitate research and education opportunities for Alaskans and visitors of all ages.
- Preserve the park's resources in order to convey its many chapters of history.
- Create intellectual and emotional connections between the visitors and the park's resources.

### STRATEGIES

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#### LOCATION IMPORTANCE

- Impart in visitors a sense of the important role this promontory played in the history of Sitka and Alaska
- Effectively prepare site planning, interpretive programming, inventorying, preserving, and displaying of the archaeological collection of this site at adequately equipped Alaskan facilities with preference for facilities in Sitka and southeast Alaska

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#### EDUCATION AND RESEARCH

- Identify partners, research possibilities, and education opportunities that will help the division preserve and interpret Castle Hill
- Develop plans and procedures to conserve and use the existing archaeological collection to benefit the site, community, and interested academics

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## PRESERVATION

- Strive to maintain the division's leadership role in historic preservation and interpretive programming in Alaska by advocating for the resources, protecting and interpreting significant features and stories, and actively managing the historic and cultural resources
- Develop interpretive programming that reflects the multi-faceted character of the site's story by recognizing all parties that occupied the hill at different points and history and the significance of each of these parties and their influence on the history of both Sitka and Alaska at large

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## FORGING CONNECTIONS

- Establish a primary interpretive theme for Castle Hill that expresses the significance of this heritage resource and supports the mission and vision of ADPOR and the vision of this plan
- Design interpretive programs that connect the visitors to the inherent tangible and intangible characteristics of this heritage resource on an emotional and intellectual level

## CHAPTER 3: HISTORY AND CULTURE

### NOOW TLEIN

The promontory known as Castle Hill was occupied by *Kiks.ádi* Tlingit clan houses at the time of first European contact around 1795. Known by the *Kiks.ádi* as *Noow Tlein*, Castle Hill was the home of four clan houses until 1804: the House of the Point or Point House, *Luka Hít*; Sun House, *Gagaan Hít*; Herring House, *Yaaw Hít*; and Inside the Fort House, *Noowtu Hít*.<sup>3</sup> Tlingit oral tradition states that *Noow Tlein* was occupied long before western contact; this was confirmed by archaeological excavation, which showed that human occupation of the site dates back to at least a thousand years ago.<sup>4</sup> The site—a 60-foot-high flat-topped promontory with water on three sides—was very defensible, particularly against antagonists without cannons. *Noow Tlein* (translated as ‘big fort’) was the site at which Baranof wanted to establish his redoubt when he first sailed into Sitka Sound.<sup>5</sup> He settled for the promontory at the mouth of Starrigavan Creek approximately six miles to the north, where he and his men began construction of Redoubt St. Archangel Mikhail (now Old Sitka State Historical Park) in 1799. Baranof returned to Kodiak in 1800 before the fort was complete.<sup>6</sup>

In June 1802, a large body of Tlingit warriors attacked Redoubt St. Archangel Mikhail and burnt it to the ground, killing most of the defenders. In September 1804, Baranof returned from Kodiak with several armed sailing ships and a large force of Aleuts. They besieged the *Kiks.ádi* Tlingit fort (its location now in the Sitka National Historic Park). After six days of fighting, the Tlingit abandoned the fort and left the region. Baranof immediately began fortifying *Noow Tlein*, calling the settlement New Archangel, to commemorate the St. Archangel Mikhail fort.<sup>7</sup>

### NEW ARCHANGEL

By June of 1805, Baranof had overseen the construction of eight large buildings at New Archangel.<sup>8</sup> By the fall of 1805, the hill was fortified with cannons, and included “enormous barracks with...turrets for defensive purposes”.<sup>9</sup> In 1818, Captain-Lieutenant L.A. Hagemeister replaced Baranof as chief manager of the Russian American Company, and over the next decade New Archangel’s decaying fortifications were progressively upgraded. By the end of the 1820’s, the redoubt contained three two-story towers with six or eight cannons each, a battery of eight cannons pointing seaward, the chief manager’s house, and numerous other buildings. This chief manager’s house was torn down in 1833 after being damaged in an earthquake. A new lavish, two-story residence for the Russian Governor was finished in 1837. This

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<sup>3</sup> (James et al 2008, in Dauenhauer et al. 2008: 107)

<sup>4</sup> (McMahan 2002: 13)

<sup>5</sup> Moss and Erlandson 1992: Table 2

<sup>6</sup> (Lisianskii 1812, in Dauenhauer et al. 2008:230-231)

<sup>7</sup> (Lisianskii 1812, in Dauenhauer et al. 2008:231-233)

<sup>8</sup> (Lisianskii 1812, in Dauenhauer et al. 2008:236)

<sup>9</sup> (Rezanov 1805, in Pierce and Donnelly 1979)

dwelling covered all of the hilltop, and included an observatory and lighthouse on its roof. This building came to be called “the Castle”, or “Baranof’s Castle”, and is how “Castle Hill” acquired its name.<sup>10</sup>

## CASTLE HILL

Castle Hill is a National Historic Landmark, referred to as the “American Flag Raising Site”, because Russia officially transferred Alaska to the United States on October 18, 1867 at this site. Here, in front of the Russian Governor’s residence, the Russian flag was lowered for the last time and the American flag first rose to fly over the soil of Alaska.<sup>11</sup>

After the transfer, the “castle” was used as the headquarters for the U.S. Army Department of Alaska until they departed in 1877. The building served as offices for the Signal Service in the 1880’s. By the early 1890’s, the former Russian Governor’s residence had fallen into disrepair and had been heavily vandalized. The U.S. government began renovations of the building in late 1893 but, just as it was finished in March 1894, it was destroyed by fire.

## AFTER THE CASTLE

In 1898, President McKinley reserved Castle Hill for agricultural research and weather service reporting. By 1899, the U.S. Department of Agriculture (USDA) had constructed a two-story frame structure on site to serve as headquarters for the Office of Agricultural Experimental Stations in Alaska. This office closed in 1932, and the USDA used the house as a private residence. The building then saw a variety of uses including American Legion post, nightclub, restaurant, and shop. This building was demolished in 1955 and the site became a territorial park.<sup>12</sup>

## CASTLE HILL STATE HISTORIC SITE

Alaska was officially admitted into the Union as the 49<sup>th</sup> State on January 3, 1959. On July 4<sup>th</sup>, 1959, the first official rising of the American flag with 49 stars took place at Castle Hill. Soon after Castle State Historic Site became one of the first state parks and was maintained as a grassy area with Russian cannons on display.<sup>13</sup> The national significance of this site was recognized on June 13, 1962, when Castle Hill was designated a National Historic Landmark.<sup>14, 15</sup>

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<sup>10</sup> (McMahan 2002:18-20)

<sup>11</sup> (Hanable 1975:2)

<sup>12</sup> (Hanable 1975:2; McMahan 2002:22-23)

<sup>13</sup> (Hanable 1975:2; McMahan 2002:22-23)

<sup>14</sup> (Hanable 1975:2;

<sup>15</sup> McMahan 2002:24)

## CHAPTER 4: EXISTING CONDITIONS AND ISSUES

### CULTURAL ZONES

No cultural or preservation zones currently exist at Castle Hill. However, development must be associated with public access, safety, and interpretation, and must not interfere with the characteristics for which the area was designated a National Historic Landmark.

### COLLECTIONS MANAGEMENT

In 1995, 1997, and 1998, the Division of Parks and Outdoor Recreation's Office of History and Archaeology conducted extensive archaeological excavation resulting in a sizeable collection. The collection provides a rare glimpse into the lives of Russians at their American outposts and pre-contact Tlingit life at *Noow Tlein*. It also provides an opportunity for further investigation and learning opportunities about cultural group interactions during the early 19<sup>th</sup> century. Artifacts include lead seals, arms and armament, coins, and organic materials such as textiles and baskets. Over 150 boxes hold the collection. The degree of diversity and organic preservation is unsurpassed by other colonial Russian collections of this type in the country. The Castle Hill collection was accessioned to University of Alaska Museum of the North during 1997-1998.

The organic preservation of the collection is currently threatened. The collection is currently stored in cardboard boxes on metal shelves in the Office of History and Archaeology laboratory in Anchorage. Access to the collection is controlled through keypad entrances and sign-in and out logs. Logs are reviewed to monitor access, along with electronic entry history stored by the keypad for each assigned user code. Significant and diagnostic artifacts are stored in locked cases and access is extremely selective.

In 2000, several artifacts were stolen from the collection. Some artifacts including a rare ivory carving have been located and returned to the collection, however, others are still missing. Due to the significance and rarity of this collection every piece is highly valuable from a scholarly point of view and artifact recovery is a very high priority for the division.

The division's Office of History and Archaeology (OHA) completed analysis and write-up of approximately 10% of the entire collection. A basic inventory exists and OHA maintains it in a database. The database tracks location information, unit number, material types, unique identifiers, excavator, and comments. The catalog has been periodically annotated with new information on analyses and loans.

Some artifacts (a specific number is not known) including a butterfly pendant are on loan to the Sitka Historical Society. That pendant is on display in the museum. Alaska State Museums accessioned some artifacts including a ravens tail robe fragment and basket. These items are currently on display and are part of the Alaska State Museums collection. OHA and the University of Alaska Fairbanks (UAF) are currently discussing long-term curation and storage of the collection in the controlled environment at UAF.

## RESEARCH

The earliest archaeological testing on Castle Hill was conducted by the OHA in 1985, when several test units were excavated into disturbed deposits. OHA began larger scale testing at the site in 1995, funded by a grant from the Federal Highways Administration to the Alaska Department of Transportation & Public Facilities, as part of a project to conduct repairs and make the site handicap accessible. Archaeological work in 1995 consisted of subsurface testing of the proposed construction area to locate and evaluate buried deposits. A data recovery plan was prepared, which guided two seasons of data recovery.<sup>16</sup> Archaeological work in 1997 focused on the proposed footprint of the trail system and equipment staging area. Structural posts and an extensive historic midden deposit were uncovered during the excavation of 52 one-meter units. Further work in 1998 excavated an additional 103 one-meter units, uncovering parts of at least four historic Russian-era buildings with associated artifacts. Testing in 1998 also uncovered a prehistoric shell midden, which dated to approximately 1,000 years ago. The 1990's data recovery project resulted in a sizeable report on the materials recovered.<sup>17</sup>

## PARTNERSHIPS

The Division of Parks and Outdoor Recreation currently has informal partnerships with the National Park Service, the City and Borough of Sitka and Sitka State Parks Advisory Board regarding Castle Hill, either because of shared history or interests. Volunteers in the park raise and lower the flags at Castle Hill. Lighting is paid for by the City and Borough of Sitka. The Office of History and Archaeology has partnered with the Alaska State Museum for curatorial assistance with the Castle Hill collection.

## LAND USE AND MAINTENANCE

Castle Hill is a small pocket park in the heart of downtown Sitka. Commanding views of downtown Sitka, Japonski Island, Sitka Sound, and the mountains are available to visitors that venture to the top of Castle Hill. The park is mainly used for historic interpretation for visitors and open space enjoyment by local residents. Primary cultural assets of the park include the hill itself, archaeological resources located during the 1995 and subsequent excavations, the Castle Hill Collection, and the Russian-era cannons stationed on the hill.

There are two primary entrances to Castle Hill. One access is through an alley off Lincoln Street and another from the parking lot located off Harbor Road. The access from the parking area meets ADA requirements. Metal pipe rails line the ADA ramp. Stairs and ramps are used to gain access to the top of Castle Hill. The entrance from Lincoln is lined with interpretive panels and entrance sign leading to a large wide stairway to the top of Castle Hill. The entrance sign is obstructed with a garbage can. Stone walls serve as railings. The stairs are lit with overhead lighting. Moss is growing on the stairs.

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<sup>16</sup> (McMahan 1997)

<sup>17</sup> (McMahan 2002)

At the top of Castle Hill a low stone wall with a concrete cap encircles the heart of the hill. A concrete walkway abuts the interior of the wall. A small oval patch of grass is situated on the interior of the walkway. Six interpretive panels are located near the stone wall. Two bronze plaques are placed on the concrete cap. The bronze plaques are staining the rock. The bronze exhibits incralac and patination failure and is severely stained.

Four Russian era cannons are located in the park; two are atop Castle Hill, and the other two are located near the parking area. The cannons are severely pitted and serve as trash receptacles. The two cannons on top of the hill are supported by wood bases and are pointed out to sea near the interior grassy area.

Tall overhead lighting is located on the top of the hill. Other vertical elements include three flagpoles of which two are used for flags of the United States and Alaska, which are continually flown at the site. The flags are up lit with small lights attached to the flag poles.

Maintenance is currently conducted as needed by state park staff responsible for all park units in the Sitka area. Graffiti removal is conducted nearly daily during the summer months. Lighting and trash receptacles are maintained by the City and Borough of Sitka. The flag is raised and lowered by State Park volunteers.

## INTERPRETATION

The following paragraphs provide a summary of current personal and non-personal interpretation in and about the park. **Personal interpretation** occurs when one person is interpreting to another, such as during a guided tour. **Non-personal interpretation** occurs when another type of media, such as an interpretive display, audio tour, or self-guided brochure, replaces the person interpreting.

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### PERSONAL INTERPRETATION

#### SITKA HISTORICAL MUSEUM

The Sitka Historical Museum, located in Centennial Hall, provides visitors with information and stories about a variety of displays and artifacts about Sitka's Tlingit, Russian, and American history. Museum staff use a detailed diorama of Russian Sitka circa 1867, the year Alaska was transferred to the U.S., to verbally interpret the multi-faceted story of Sitka. Castle Hill, or *Noow Tlein*, plays a starring role in this story of struggles, changes, and finally inter-cultural acceptance.

#### TRANSFER CEREMONY REENACTMENT

Every year on Alaska Day, October 15<sup>th</sup>, the City of Sitka commemorates the Alaska Transfer with a week of celebrations ending with a reenactment of the Transfer Ceremony atop Castle Hill. For this reenactment, Sitka residents don period clothes appropriate for the dignitaries, soldiers, and spectators that were present at the 1867 ceremony.

### SITKA HISTORICAL MUSEUM

The Sitka Historical Museum's diorama of Sitka circa 1867 is one of the museum's most popular interpretive displays. In this diorama, Castle Hill is a prominent focal point. The visitor is able to see how the location of the hill related to Sitka at the time of the Alaska transfer and why it was such a strategic location for forts and look-out posts. Serving the community year round, the museum also distributes a walking tour map that guides visitors to Sitka's National Historic Landmarks and other key attractions.

### INTERPRETIVE PANELS

There are five interpretive panels at each of the two main Castle Hill entrances, and five at the top of the hill. Both main entrances and the top of the hill have panel frames that are currently being used as the location for a map of downtown Sitka showing where other historically significant sites are located nearby. At the top of the hill, one of the original panels, "Tlingit History of *Noow Tlein*", was missing and had been replaced by a duplicate of the "Castle Hill becomes Russia's Colonial Capital" panel. All of the panels were given slight graphic enhancements and reprinted in June 2010 and "Tlingit History of *Noow Tlein*" was re-installed. All five of the existing panels are in acceptable condition, however, their content is dated and in many, the language is no longer socially acceptable. The five panels located at each of the two main entrances are physically in good condition, but there is some overlap in the content of these panels and the ones at the top of the hill.

#### INTERPRETIVE PANELS AT THE MAIN ENTRANCES

1. **The Alaska Purchase:** describes why the Russians were interested in selling Alaska, the negotiations between Eduard de Stoeckl and William Seward, and the transfer of Alaska to the United States.
2. **Castle on the Hill:** explores the Russian use of Castle Hill that gave it its name and introduces visitors to the people that were influential in bringing European customs, lifestyle, and architecture to Sitka and Castle Hill.
3. **Sheet' ká Kwáan People by the Sea:** introduces visitors to the people who occupied Sitka and Castle Hill for hundreds of years before Russian conquest. It also describes why this location was so attractive to the Tlingit and the hill's strategic importance in the history of these people.
4. **The Russians Settle:** briefly tells the story of the Russian settlement in the location currently known as Old Sitka and the subsequent battle in 1802, the Russian retaliation in 1804, and Russian settlement in Sitka and occupation of Castle Hill by the chiefs of the Russian-American Company.
5. **History on the Hill:** provides the visitor with a summary of Castle Hill's history with brief explanation of Tlingit occupation of the area prior to contact with the Russians and a timeline of Russian and later American history in Alaska, Sitka, and Castle Hill from 1741 to 1998.
6. **Sitka Downtown Map:** orients visitors to Sitka while providing them with the names of principal traffic arteries and the locations of significant /historical sites in Sitka.

#### INTERPRETIVE PANELS AT THE TOP OF CASTLE HILL

1. **The Day Alaska Changed Hands:** describes the transfer of Alaska from Russia to the United States, Russia's reasons for selling Alaska, and the ceremony during which Alaska changed hands. It also acknowledges that the original inhabitants of Alaska were overlooked in this transaction and that some effects of this mistake are still experienced by Alaskans today.
2. **A Strategic Hill:** describes what this hill once looked like, how the Tlingit considered it a strategic site and explores the story of the Russian adventure in Alaska including the battles of 1802 and 1804.
3. **Castle Hill becomes Russia's Colonial Capital** (duplicated): explains Castle Hill's importance to the government of Russian America. This panel also describes the eventual Native settlement adjacent to New Archangel and the dynamics between the two settlements.
4. **Buildings on the Hill:** allows the visitor to see the hill and its crowning structures as five distinct snapshots in time—the Tlingit clan houses; Baranof's rustic plank cabin, a log house, and a surrounding palisade; a chief manager's wooden house with an iron roof, barracks with iron roofs, and a new palisade with three towers armed with 32 cannons; the last chief manager's extravagant house called Baranof Castle; and finally the U.S. Department of Agriculture's Office of Alaska Experimental Stations.
5. **Tlingit History of Noow Tlein:** introduces visitors to the original settlers of Sitka and holders of *Noow Tlein* (Castle Hill). It also tells the story of the Tlingit-Russian conflicts in the first decade of the nineteenth century and of how *Noow Tlein* changed hands from the Tlingit to the Russians.
6. **Sitka Downtown Map:** orients visitors to downtown Sitka by means of a map complete with a legend for visitor attractions and a key to historically significant locations in divided by district.

#### STAFFING

Castle Hill is among 42 state park units within the Southeast area Alaska State Park system, which covers the Alaska panhandle. There are eight Sitka area park units, including Baranof Castle Hill SHS. A Park Specialist manages these park units with the help of an Alaska Conservation Corps (ACC) employee and volunteers; this limited staffing structure makes it difficult to provide personal contact with visitors. Also, because Castle Hill is located in downtown Sitka and is easily accessible, vandalism is nearly a nightly occurrence and park employees must remove graffiti and other forms of vandalism daily. Lighting provided by the City of Sitka has helped decrease the amount of vandalism at this historic site but has not stopped it.

## CHAPTER 5: RECOMMENDATIONS

The following strategies for preservation and interpretation of Castle State Historical Site (SHS) will assist managers in meeting the plan's stated goals and objectives.

### CULTURAL ZONES

A critical strategy for achieving the plan's goals and objectives is the development and implementation of preservation zones. The establishment of preservation zones is intended to further a greater understanding of the resources and provide clear guidance for the interpretation and preservation treatments of historic resources.

### PRESERVATION ZONES

Preservation zones enable managers to better facilitate continued preservation, development, program expansion, visitor growth, and general enjoyment of Castle Hill. If land-use designations are established at a future date as part of a management planning process, the preservation zones will be supplementary and will not supersede the land-use designations. In the absence of a management plan, park staff, design professionals, park management, and the public should closely follow the building- and area-specific recommendations related to historic preservation and interpretation associated with the preservation zones.

Only one preservation zone is pertinent to Castle Hill SHS – Zone Three. Each zone established by DPOR has a unique preservation objective related to the buildings, landscape, archaeology, and interpretation. These objectives should be used to guide decisions in each zone, while making sure to meet the preservation and interpretation objectives of this plan.

### PRESERVATION ZONE THREE – REHABILITATION ZONE

**Zone Three** covers the entirety of the park. Some of the primary features of the park include the flagpoles, cannons, vistas, and archaeological resources that may still be intact. Interpretation plays a key role in understanding the site.

**The primary treatment in Zone Three is Rehabilitation.** Areas designated as Zone Three may embody distinctive characteristics or features that are distinctive in their own right, contain spatial relationships from the period of significance, but are secondary in nature. These areas are less rich in significance compared to Zone One areas. Every effort should still be made to retain original features and fabric in restoration areas. However, new materials and features can be introduced in rehabilitation zones if they are done sensitively and the primary character-defining features that are intact are retained. *“Rehabilitation is defined as the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values.”* All work conducted in a Rehabilitation Zone must adhere to the Secretary of the Interior's Standards for Rehabilitation (Appendix A).

Short  
Range  
Priority

## COLLECTION MANAGEMENT

The Castle Hill collection, uncovered in the 1990s provides an unprecedented glimpse into the lives of Russians at one of their American outposts. Additionally, it supplies information about Native Alaskan occupation of *Noow Tlein*. The collection has many cultural, academic, and interpretive values and should be preserved to the fullest extent possible.

### INVENTORY AND ASSESSMENT

A complete inventory, consisting of an itemized listing of all objects within the collection, should be completed. The inventory should include not only the objects in storage, but also objects that are on loan to other repositories, objects on exhibit, objects undergoing conservation and objects that were previously missing and have yet to be recovered. Subsequent inventories should be undertaken on a periodic basis, as delineated in a collection treatment plan.

*Mid  
Range  
Priority*

The condition of the collection as a whole should be evaluated, and a course of action regarding its care and management should be delineated. Each object should be assessed for damage and the type, extent, location and reason (if known) for the damage should be recorded. The treatment plan should take into consideration the mission and goals of the final repository for the collection.

### ARTIFACT RECOVERY

ADPORA should continue its effort to locate items missing from the collection. Missing items should be highlighted in staff presentations to make the concerned public aware. Concerned citizens can help ADPORA locate and return items to the collection. In addition, staff should periodically scan websites and stores where archaeological resources are sold. Ensuring that the collection is as complete as possible is important for interpretation and research of Castle Hill.

*Mid  
Range  
Priority*

### LONG TERM CURATION

To best serve curation and conservation responsibilities, collections from state lands are normally accessioned within the State Museums system. Of the museums administered by the state, the University of Alaska Museum of the North (UAM) in Fairbanks is the only facility currently able to accept large archaeological collections. The museum is accredited by the American Association of Museums (AAM) and is the premier repository for artifacts and specimens collected on public lands in Alaska. ADPORA recognizes the benefits of interpreting the Castle Hill collection in southeastern Alaska, and supports the loan of items by UAM to local or regional museums for the development of exhibits. The recipient museum must have a building with weatherproof and fireproof construction, humidity control, and otherwise be able to care for the collection as outlined in AS 41.35.020(b)(1).

*Mid  
Range  
Priority*

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## LOAN TO SITKA AREA MUSEUMS

ADPOR should work with UAM to help facilitate artifact loans to Sitka Area Museums. Technical assistance could include helping to ensure facilities meet standards established by the State of Alaska in AS 41.35.020. Those standards include ensuring the building in which the collection will be housed is weatherproof, fireproof, and humidity controlled. Safe preservation of the artifacts is the ultimate goal. A transportation plan should be developed to ensure that portions of the collection are not at risk. For any items requiring special treatment, ADPOR should work with the cultural group to ensure that special care is taken. All loans should be documented with a loan agreement that outlines the factors specified in AS 41.35.020.

*Long  
Range  
Priority*

## RESEARCH

Systematic research will further guide resource management decisions, create better interpretive possibilities, more accurately depict historic resources, and provide a framework to conduct archaeological investigations.

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## DATABASE

It is recommended that ADPOR develop a database of all inventoried artifacts and academic resources that pertain to Castle Hill. Aspects of Castle Hill that should be captured in the database include Tlingit occupation of the site, Russian outpost life, and transfer of Alaska to the United States. The research database would include artifacts collected (previous and future) within the boundaries of Baranof Castle Hill SHS, books, professional journal articles, newspaper articles, diaries, recorded oral histories, photographs, firsthand accounts and other records related to Castle Hill. High grade photos should be taken of diagnostic items and the photo linked with the catalog record. It should be noted in the database where the resource is located. As new works are published, new oral histories are gathered, or new artifacts are collected, the database should be updated. Every attempt should be made to ensure this database is made available to the public, including making the database available through links on the Castle Hill State Historic Site website.

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## ARCHAEOLOGICAL INVESTIGATION

Further survey should be systematically conducted on the northwest and northeast slopes of Castle Hill. The remains of four Russian buildings and associated archaeological resources on the sloping bench on the southeast side of the hill were largely removed during the 1998 construction, although the foundation of a metalworker's kiln and a small area of intact organic-enriched midden deposit were left undisturbed. Also, Tlingit cultural materials could be located in these undisturbed areas. If survey results are positive and historic materials are found to be significant, an appropriate treatment plan should be outlined and approved prior to further excavation.

*Long  
Range  
Priority*

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## RESEARCH PLAN

After all resources, inventoried artifacts and academic resources are compiled and entered in the database, ADPOR can establish thematic and specific research plans. Gaps in current information should be identified so research can be geared to fill identified information needs. All research activities should be as non-invasive as possible. Proposed archaeological research should have research designs with clear research questions and obtainable objectives. All research projects should result in final reports that are included in the research database and made available to the public. Research plans should take into consideration upcoming seminars, workshops, conferences, and anniversaries so collected information is appropriately disseminated.

*Mid  
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Priority*

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## ACADEMIC

ADPOR will promote and support academic research related to Castle Hill. ADPOR will allow access to existing archaeological and written resources to further academic knowledge and understanding of the park and similar historic resources. Overall, ADPOR will provide an environment of continued learning to further the proper management of Castle Hill. Dissemination of information can include supporting attendance of ADPOR employees to workshops and conferences related to Russian-American history, archaeological preservation and interpretation, and American colonization of Alaska.

*Mid  
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## PARTNERSHIPS

Documented and informal partnerships would benefit programs and maintenance activities at Castle Hill. A degree of formalization is necessary so relationships between entities are known when people or priorities change in organizations.

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## EDUCATION PARTNERS

Educational partners can assist in expanding programming, increasing educational opportunities, and nurturing research activities year round. Potential education partners include:

- Alaska Pacific University
- Alaska Private & Home Educators Association
- Mount Edgecombe High School
- National Park Service, Sitka National Historical Park, Sitka Cultural Center, and Alaska Regional Office
- Sheldon Jackson Museum
- Sitka Historic Preservation Commission
- Sitka Historical Society Museum
- Sitka School District

*Mid  
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Priority*

- University of Alaska Southeast

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## PROMOTIONAL OUTREACH PARTNERS

Partnerships specifically formed in an effort to promote the park and its historical resources are encouraged. Potential partners include tourist organizations, local government, and media. In addition to marketing at the local level, the division should look to potential statewide and national audiences.

Potential promotional partners include:

- Alaska Cruise Association
- Alaska Travel Industry Association
- Sitka Chamber of Commerce
- Sitka Convention and Visitor's Bureau
- Sitka Historical Society
- Sitka Tribe

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## MAINTENANCE PARTNERS

ADPDR will attempt to expand and develop maintenance partnerships with organizations, institutions, and agencies. Partnerships will help ADPDR present a better product to park users and build the feeling of ownership in the community. Potential maintenance partners could include, but are not limited to the following:

- City and Borough of Sitka
- Sitka Historical Society
- Sitka Tribe
- Commercial entities

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## RESEARCH PARTNERS

Research partners could help increase knowledge and survey and analysis funding opportunities for the park. Potential partners include agencies, institutions, organizations, and private researchers, including:

- Alaska Pacific University
- National Park Service, Sitka National Historical Park, Sitka Cultural Center, and Alaska Regional Office
- Sheldon Jackson Museum
- Sitka Historic Preservation Commission

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Priority*

- Sitka Historical Society
- Sitka Tribe
- University of Alaska Southeast
- Private Researcher

## LAND USE AND MAINTENANCE

### FLAGS AND FLAGPOLES

A formal arrangement should be established for raising and lowering of the flags at Castle Hill. The flags are critical components of the site and the opportunity to highlight the historic importance of the raising and lowering on a daily basis should be captured. DPOR should establish a specific time of the day during the tourist season when flags will be ceremonially raised and lowered. This can be conducted by park staff or park volunteers.

*Mid  
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Priority*

### ENTRANCE SIGNS

The *Kiks.ádi* place name for Castle Hill, *Noow Tlein*, should be added to all entrance signs to the park. In the short term, new smaller wood signs could be attached above or below the existing signs reading “*Noow Tlein*”. In the future, when signs are replaced, *Noow Tlein* should be included in the entrance sign while maintaining the official name of the state historic site.

*Mid  
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Priority*

### GRAFFITI

Graffiti is an issue common at Castle Hill. The most effective deterrent of graffiti is vigilant monitoring and expedited removal. However, graffiti removal must be carefully planned because hasty removal can cause irreversible damage to concrete and stone. Currently, graffiti at Castle Hill is mostly located on concrete and the stone wall, so a common approach can be used for its removal. To meet established preservation standards, the gentlest means possible must be employed to remove graffiti. A step-by-step outline is established in this document. However, testing must occur in the field to determine the gentlest method for different graffiti types. ***Preservation Brief 38: Removing Graffiti from Historic Masonry*** is an excellent source for additional information. The process for graffiti removal is outlined below:

*Short  
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Priority*

- Identify the type of graffiti (spray paint, markers, pencils, etc.)
- Identify the substrate
- Choose the method and material that will be used
- Test the chosen application

If the test is successful, continue application. If the test is not successful, reevaluate the method and/or material.

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## CANNON

To slow down deterioration, the cannons should receive annual maintenance. In the spring, guns should be power-washed with water at a low pressure (psi). An appropriate psi should be determined through testing. Next, they should be washed with non-ionic detergent with natural bristle brushes. Then rinse the cannons again at a low psi. Additionally, trash and debris should be removed from the cannons on a weekly basis.

*Short  
Range  
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## BRONZE PLAQUES

All bronze plaques in the park should be refinished. Plaques should be carefully removed and bead blasted in a controlled environment. An appropriate finish should be selected and applied. Reinstallation can occur following patination.

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## LIGHTING

New site lighting should be selected that is lower in profile. New vertical elements that compete with the flagpoles are not appropriate in this park. Preferably, new lighting should be attached or inserted in the stone wall and focused down. Site lighting on the trail leading to the top of the hill should be low profile. The only appropriate up lighting is on the flagpoles.

*Long  
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Priority*

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## INTERPRETATION

Interpretation is meant to enhance a visitor's experience by revealing what makes the site or resource significant, and is a valuable management tool because it "... forges emotional and intellectual connections between the interests of the [visitors] and meanings inherent in the resources"<sup>18</sup> prompting an appreciation of the resources that fosters stewardship. Interpretation at Castle Hill will not only tell visitors what is significant about the site but also aim to help visitors understand the park's value as part of Alaska and the United States' heritage, to encourage preservation, and to instill a sense of community ownership in the park.

The following section outlines interpretive themes and the division's recommendations for personal and non-personal interpretation.

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## INTERPRETIVE THEMES

THEMES are the primary messages visitors should understand about a particular interpretive site or presentation. Themes bring a sense of continuity to a site and assist planners when organizing the content and structure of topics for interpretive materials.

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<sup>18</sup> NAI definition of interpretation [http://www.definitionsproject.com/definitions/def\\_full\\_term.cfm](http://www.definitionsproject.com/definitions/def_full_term.cfm)  
(07/22/10)

## PRIMARY INTERPRETIVE THEME

Baranof Castle Hill is among the most important landmarks in Alaska history; three distinct eras of Alaska history are represented by the people that claimed and occupied Castle Hill – Alaska Natives, Russians, then Americans.

### *Subthemes*

*Precontact-1804: Called “The Point” or “Noow Tlein”, Castle Hill was the site of four important Tlingit clan houses – Luka Hít or Point House, Gagaan Hít or Sun House, Yaaw Hít or Herring House, and Noowtu Hít or Inside the Fort House.<sup>19</sup>*

- During the battle of 1802, the Sitka Tlingit defeated the Russians at Redoubt St. Michael. They killed most of the Russian settlers and burned the fort to the ground.
- The Tlingit expected Russian retaliation and were on the look-out for Russian vessels after the battle of 1802. The point provided the Sitka Tlingit with a defensible high point from which they could see approaching vessels in the bay.
- The Russians returned in 1804 and, after a six day siege, they defeated the Tlingit who left quietly in the night on a self-imposed exile.

*1804-1867: After defeating the Tlingit in 1804, the Russians took over Castle Hill and claimed the settlement site for Russia naming it New Archangel; this trading post and settlement remained an important center for trading and culture in Russian America until 1867.*

- When the Tlingit were defeated and went into exile, Baranof ordered a fort built at the top of the hill. The fort became the headquarters for the Russian-American Company.
- Baranof and the chief managers of the Russian American Company that succeeded him lived on the hill. The chief’s living quarters went from a rustic cabin surrounded by a palisade to a wooden house with an iron roof, barracks with iron roofs, and a new palisade with three towers armed with 32 cannons to the last chief manager’s extravagant house called Baranof Castle.
- During the era of Russian rule, Sitka became the most substantial European settlement in northwestern North America and earned the moniker “Paris of the Pacific”.

*1867-present: In 1867, the Russians sold Alaska to the United States. The official transfer ceremony took place atop Castle Hill where the first American flag was raised and a new chapter in Alaska’s history was ushered in.*

- “Seward’s Folly” or “Seward’s Icebox”, as people tauntingly dubbed Alaska, was bought from Russia for \$7.2 million, or about two cents an acre, and the transfer was made official on Castle Hill in 1867.

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<sup>19</sup> (James et al 2008, in Dauenhauer et al. 2008: 107)

- Sitka remained the capital of Alaska until 1906 when Juneau became Alaska’s new capital.
- Federal employees used Baranof’s Castle from 1867 until it burned down in 1894. The U.S. Department of Agriculture’s Office of Alaska Experimental Stations was built on Castle Hill in 1899 but was torn down in 1955.
- Castle Hill was declared a territorial park in 1955 and, when Alaska gained statehood in 1959, Castle Hill became the site of the unofficial first raising of the 49-star American flag and one of the first state parks.
- Castle Hill was designated a National Historic Landmark in 1962.

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## PERSONAL INTERPRETATION

Personal interpretation occurs when one person is interpreting to another. Authors Lisa Brochu and Tim Merriam provide an excellent summation of personal interpretation in their book, “Personal Interpretation: connecting your audience to heritage resources”:

*“Personal interpretation is one of the most powerful approaches to interpretation because the interpreter can continually adapt to each audience. If you are practicing personal interpretation, the opportunities for you to make emotional and intellectual connections are numerous, because you can learn about the guest and apply what you learn to enhance her or his experience. However, personal interpretive services are usually available for a limited amount of time...and perform variably, depending upon the skill of the interpreter and how she or he feels at any given time.”<sup>20</sup>*

## SITKA HISTORICAL MUSEUM

The Sitka Historical Museum employees provide Sitka visitors and residents with personal interpretation related to the events that shaped Sitka and the history of Alaska in which Castle Hill played a central role, and could provide division staff with expertise in interpreting the story of Castle Hill to park visitors. The division recommends working with the Sitka Historical Museum to develop—using the interpretive themes described herein—a personal interpretation guide (described below) to assist park staff and volunteers in sharing Castle Hill’s stories with visitors. Training for park staff and volunteers at the beginning of each season in interpretive techniques and the park’s interpretive themes would enhance the overall visitor experience.

Mid  
Range  
Priority

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<sup>20</sup>Brochu, *Personal Interpretation: connecting your audience to heritage resources*, 23.

## PERSONAL INTERPRETIVE GUIDE

A small guide to interpreting Castle Hill, in booklet form, would assist tour guides, volunteers, and park employees when sharing the story of Castle Hill with visitors, school groups, etc. The guide would provide direction for personal interpretation of Castle Hill and its role in Alaska's history. It would ensure that the park's major theme and subthemes are adequately and effectively presented to the interested public. The guide would briefly develop each of the subthemes and provide examples and suggestions for creating an interesting and effective interpretive experience for park visitors. The development of this personal interpretation guide would provide an excellent opportunity to partner with other interested government agencies and private parties and could include other historically significant sites or events that are closely related to the story of Castle Hill.

Mid  
Range  
Priority

## NON-PERSONAL INTERPRETATION

Non-personal interpretation occurs when the person interpreting is replaced with another type of media, such as an interpretive display, audio tour, or self-guided brochure. At Castle Hill, non-personal interpretation will enhance visitors' experiences when they are visiting the park independently, when the Sitka Historical Society and Museum is closed, or outside scheduled times for oral presentations at either the park or the museum. Non-personal interpretation presents a consistent story and message and is not susceptible to a guide's skill or feelings on any particular day, as described in the "Personal Interpretation" section.

The following descriptions present recommendations for the following types of projects: on-site displays, brochures, and audio device interpretation.

## ON-SITE INTERPRETIVE DISPLAYS

On-site, static interpretation will be the primary media for interpretation in the park. All interpretive displays located at Castle Hill should be evaluated for relevancy, accuracy, appropriate language use and word choice, adequacy of graphic elements, and overall condition at least once every five years. The following project descriptions are both site and topic specific. **Note:** The project numbers do not correspond with implementation priority.

### *Project #1: Top of Castle Hill*

The division recommends replacing the existing five interpretive panels and the map of downtown Sitka with six new interpretive panels located at the top of Castle Hill. The new panels should support the main interpretive theme for the park and each should incorporate one or more of the sub-themes presented at the beginning of this section. Content from the existing panels may be re-used as appropriate; however, the written content should be improved to ensure its accuracy and continued relevancy. One option would be to re-use the main themes of the existing panels and create two panels with the main theme of "A strategic Hill" by introducing the early Russian settlement in Sitka, Native-Russian relations, and the battle of 1802 in one panel, and the battle of 1804, and the subsequent changes in occupation of Sitka and Castle Hill in another panel. All new panels should have identifiable, thematic graphic elements.

Short  
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Priority

The division also recommends improving the panel mounts. Ideally, the existing mount bases should be fixed up and a new back plate affixed to the bases. This would allow panels to be mounted directly onto the back plate leaving no frame edges in the front to collect debris and therefore the panels would require less maintenance.

#### *Project #2: Main Entrances*

The five interpretive panels located at the two main entrances to Castle Hill are in acceptable physical condition; however, the content of these panels widely overlaps with the content of the panels on the top of the hill. The division recommends replacing these panels with panels that do not duplicate the stories told at the top of the hill. Three panels could explore the story of the three groups of people to have occupied the hill—Tlingit, Russians, and Americans. One panel could tell the story how the archaeological resources of the site tell Castle Hill's story. Two more panels would serve to orient visitors to Sitka, the Sitka Area state parks, and to Castle Hill; one of these orientation panels would replace the "Sitka Downtown Map".

*Short  
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#### *Project #3: Archaeological Dig*

Uncover the remaining foundation of an iron-smith shop on the hill and protect it with strong, see-through material that would allow visitors to see an in-situ archaeological resource at Castle Hill without damaging it. Use this visible but protected resource as part of an interpretive display highlighting this historic site's rich archaeological resources and explaining how archaeologists and anthropologists are able to use these resources to unravel the story of Castle Hill's use throughout centuries past.

*Mid  
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Priority*

### **SITKA AREA PARK BROCHURE**

A brochure introducing all eight of Sitka's state park units would provide information on each unit's purpose, highlights, and opportunities. Elements in the formatting and layout would be designed to match Alaska State Parks' standard design, thus creating a product that is easily identifiable.

*Mid  
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Priority*

### **AUDIO DEVICE INTERPRETATION**

Cell phone interpretation or podcasts or other means of audio device interpretation could be valuable tools to enhance accessibility of the park's interpretive programs by providing an audio alternative for people with visual disabilities. Audio device interpretation could also provide interpretation in other languages such as Tlingit, Japanese, Russian, Spanish, German, etc. that would allow the division to reach out to visitors from a variety of backgrounds. Further research into the applicability and practicality of this mode of interpretation at Castle Hill is recommended. Cell phone coverage at this site, public opinion, demographics, and cost are some factors that must be considered.

*Long  
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Priority*

### **PARK STAFF**

The Alaska State Parks staff members are the key to a successful park system. With adequate staffing, the successful management of public lands such as Castle Hill becomes an easier task and allows for more and better services to park visitors. When set to the highest standard, successful management of state historical parks and historic sites would include a higher level of interpretation and active preservation.

The division recommends that a staff person or a combination of staff persons that meet the criteria listed below be employed to meet the needs particular to Castle Hill.

Desired qualifications:

- Ability to effectively communicate interpretive messages about the park’s archaeological, cultural, and natural resources to visitors
- Understanding of preservation strategies for historic landscapes and archaeological collections
- Law enforcement capabilities to enhance visitor safety and deter vandalism
- Understanding of the cultural and historical significance of this park and knowledge of the story of Castle Hill, especially the story of the Alaska Purchase

The division recommends that staff members responsible for overseeing and managing this park perform duties such as the following:

- Regularly thin out and cut back vegetation as needed to ensure the site remains ADA accessible
- Ensure that all applicable federal, state, and local rules and regulations are followed within the park
- Address safety hazards as needed
- Enhance the visitor experience with personal interpretation as opportunities allow

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## INTERNSHIPS AND ALASKA CONSERVATION CORPS

The division recommends offering internships or Alaska Conservation Corps (ACC) positions to high school and college students. The interns or ACCs could carry out general maintenance activities, conduct research on Castle Hill archaeological resources and preservation technologies, conduct interpretive tours, and provide personal interpretation to park visitors depending on the intern or ACC’s interests, abilities, and field of study. Offering internships or ACC positions to Alaskan students provides the division with an opportunity to help further the education of Alaskan youth and provide them with work experience. The hired students would, in turn, help the division provide improved services to the public and better understand the park resources.

*Short  
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Priority*

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## VOLUNTEERS IN THE PARK

The division recommends the continued use of volunteers in the park to assist park staff in certain park projects. Park staff should identify volunteer opportunities and conduct outreach programs in the community to fill the park’s need for volunteers. Volunteer opportunities could include trail maintenance, vegetation control, personal interpretation, and visitor contact. To have an effective volunteer program, all volunteers must be trained and appropriately supervised.

*Short  
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Priority*

The Alaska State Parks staff members are the key to a successful park system. With adequate staffing, the successful management of public lands such as Old Sitka SHP becomes an easier task and allows for more and better services to park visitors. When set to the highest standard, successful management of state historical parks would include a higher level of interpretation and active preservation. The following recommendations are meant to provide guidance to help Old Sitka SHP achieve the highest standard of successful park management as Alaska State Parks continues to strive towards excellence.

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## PROFESSIONAL STANDARDS

Park staff should be easily identifiable so that visitors know who to go to for help or with questions. The presence of uniformed staff members in state parks also helps visitors feel safer and stay on their best behavior. In addition, the uniforms help maintain a professional image of Alaska State Parks and promote a greater level of confidence in Parks staff.

Park employees and volunteers should always be ready to answer questions for visitors, help them, and provide impromptu interpretation about park resources or stories pertaining to the park during regular work hours. They should also be willing and ready to help visitors recreate safely, encouraging enjoyment of the park's natural and historic resources. Above all, Park employees and volunteers should remember that they represent Alaska State Parks and so, they should support the mission and vision of Alaska State Parks with their presence and their actions.

## CHAPTER 6: PLAN EVALUATION

The effectiveness of the plan should be evaluated by the resulting quality of the visitor experience and resource protection, not the number of recommendations completed. The plan should be re-evaluated every five years and updated as necessary.

This plan reflects the best efforts of ADPDR to analyze the resources of the park and to provide recreational and interpretive opportunities that enhance the visitor experience and the historical, cultural, archaeological or anthropological values for which the park was established. This plan is expected to remain relevant to the park's management for approximately 20 years; however, intermediate reviews and appropriate modifications are expected and encouraged. The director may initiate a review at any time and it is strongly recommended that the plan be reviewed via a public process at least every 10 years.